

UNITED STATES DISTRICT COURT

NORTHERN

DISTRICT OF ILLINOIS, EASTERN DIVISION

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

CASE NUMBER:

VANESSA RHODES

MAGISTRATE JUDGE SCHENKIER

08CR 448

I, Krystle L. Intoe, the undersigned complainant being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about June 2, 2008, in Cook County, in the Northern District of Illinois defendant(s) did, (Track Statutory Language of Offense)

knowingly and intentionally possess with intent to distribute a controlled substance, namely, in excess of one-hundred grams of a mixture containing heroin, a Schedule I Narcotic Drug Controlled Substance,

in violation of Title 21 United States Code, Section(s) 841(a)(1)

I further state that I am a Special Agent with the United States Immigration and Customs Enforcement and that
this complaint is based upon the following facts:

See attached affidavit.

FILED

JUN 03 2008 TC

Continued on the attached sheet and made a part hereof: Yes No

**MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT**



Signature of complainant

Signature of Complainant

Sworn to before me and subscribed in my presence,

June 3, 2008 at
Date

Chicago, Illinois

City and State



STATE OF ILLINOIS)
) SS
COUNTY OF COOK)

AFFIDAVIT

I, Krystle L. Intoe, being duly sworn on oath, state as follows:

1. I am a Special Agent with the Department of Homeland Security, U.S. Immigration and Customs Enforcement (ICE) and have been so employed since April of 2006. My primary duties consist of investigating criminal violations of the federal controlled substance laws, including, but not limited to, Title 21, United States Code, Sections 841, 843, and 846. I am an investigative or law enforcement officer of the United States, within the meaning of Title 18, United States Code, Section 2510(7); that is; I am an officer of the United States who is empowered by law to conduct investigations of, and make arrests for, offenses enumerated in Title 18, United States Code, Section 2516.

2. I am currently assigned to the office of the Resident Agent in Charge (RAC) O'Hare International Airport. During my employment, I have received specialized training and have experience in investigating violations of the immigration, import and export laws of the United States, including violations involving the illegal importation of narcotics. Specifically, I have received training in the smuggling of narcotics across the United States (US) borders and the methods used to traffic narcotics into the United States.

PURPOSE OF THE AFFIDAVIT

3. The information contained in this affidavit is based on my personal knowledge, as well as information obtained from official documents and the personal knowledge of other law enforcement officials, surveillance, and interviews of witnesses.

4. This affidavit is being submitted for the limited purpose of setting forth probable cause to support a criminal complaint. I have not set forth each and every fact known to me concerning this investigation. Rather, I have set forth only those facts that I believe are sufficient to establish probable cause to believe that Vanessa Rhodes knowingly and intentionally possessed with intent to distribute a controlled substance, namely, in excess of 100 grams of mixtures containing heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21 United States Code, Section 841 (a) (1).

SUMMARY OF THE FACTS ESTABLISHING PROBABLE CAUSE

5. On May 27, 2008, USPS Global Express Package, Tracking Number ED40 8056 015I N ("Subject Parcel") was presented for inspection at the U.S. Customs and Border Protection ("CBP") mail hub in New York. The CBP hub is one of several arrival sites for international mail shipments to the United States and was the first point of entry into the United States for the Subject Parcel. All items making entry into the United States are subject to examination. The Subject Parcel was selected for an extensive exam by CBP Officers.

6. The Subject Parcel was addressed to David Brown, B&W RNT LLC, 2624 W. Adams, Garden Rear, Chicago, Illinois, 60612, U.S.A. ("Subject Address"). The package showed a return address of A39 First Floor Lajpat, Nagar-2nd, India. The exterior of the package was a cloth-like wrapping with handwritten markings indicating the shipping and return address. Through database queries and surveillance, agents determined that the Subject Address is a valid address in Chicago, Illinois.

7. When the Subject Parcel was opened by CBP Officers, a cardboard box was discovered. Secreted within the walls of the cardboard box were four taped bundles. The taped bundles contained a tan powdery substance. A field test conducted indicated that the substance was

presumptively positive for the presence of heroin and weighed approximately 268 grams, which in my experience, is a quantity indicative of intent to distribute, rather than personal use.

8. Agents took custody of the Subject Parcel and its contents for further investigation.

CONTROLLED DELIVERY OF SUBJECT PARCEL

9. On or about June 2, 2008, law enforcement authorities conducted a controlled delivery of the Subject Parcel to the Subject address in order to identify the person or persons who took possession of the Subject Parcel. As part of this controlled delivery, the actual controlled substance was replaced with mainly sham material.

10. Before delivering the Subject Parcel and pursuant to a lawful court order, obtained from Magistrate Judge Geraldine Soat Brown on May 30, 2008, agents placed a "Trip Wire Beacon" device inside the recreated cardboard box containing the sham. The cardboard box with the Subject Parcel was set to emit a recognizable signal to the agents when the cardboard box was moved or opened. Within minutes after the Subject Parcel was delivered, a Green Range Rover, bearing Illinois license plate 968 9719 arrived at the Subject Address. The vehicle was occupied by a male driver, later identified as Individual A; a female passenger, later identified as VANESSA RHODES; and a male passenger, later identified as Individual B. Individual B exited the vehicle and approached the door of the Subject Address, where Individual B retrieved the Subject Parcel and carried the Subject Parcel into the vehicle where Individual A and RHODES were waiting. The three passengers drove around the block several times at a slow rate of speed. Individual B was dropped off on a nearby street while Individual A and RHODES proceeded to drive around. During this time, a surveillance officer observed RHODES in the passenger seat holding and attempting to manipulate the Subject Parcel.

11. Agents received notification from the "Trip Beacon Device" that the Subject Parcel had

been opened. Law enforcement officers approached the vehicle near the intersection of Jackson and Kedzie, identified themselves as law enforcement officers, and took the vehicle's occupants into custody. Officers examined the box and observed that it had been opened and that the flaps concealing the sham narcotics had been peeled back. Individual B further told officers that while he was in the vehicle, RHODES was holding the box in her lap.

12. During a post-Miranda interview with officers, RHODES stated that she had opened the Subject Parcel, believing that it contained narcotics. RHODES further stated that, prior to receiving the package, she had sent money via wire transfer to a man in Nigeria as payment for the narcotics. Upon receiving the narcotics, RHODES intended to have another individual distribute it in the Chicago area and share the proceeds with her.

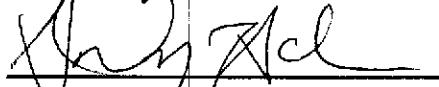
13. Based on the aforementioned facts, I respectfully request that a criminal complaint be issued charging VANESSA RHODES with knowingly and intentionally possessing with intent to distribute a controlled substance, namely, in excess of 100 grams of mixtures containing heroin, a Schedule I Narcotic Drug Controlled Substance, in violation of Title 21, United States Code, Section 841 (a) (1).

FURTHER, AFFIANT SAYETH NOT.



Krystle L. Intoe
Special Agent
Immigration and Customs Enforcement
Chicago RAC-O'Hare Office
Des Plaines, IL 60018

Sworn to before me and subscribed in my presence
this 3rd day of June 2008



SIDNEY I. SCHENKIER
United States Magistrate Judge